

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<p>UNITED STATES OF AMERICA,</p> <p>Plaintiff,</p> <p>v.</p> <p>[1] LOUIS T. COLON-OJEDA a.k.a “La Flaca” a.k.a “el Cabro”, [COUNTS ONE AND TWO]</p> <p>[2] FRANKLIN T. PRATS a.k.a “ La Tia”, a.k.a “Frank” [COUNTS ONE AND TWO]</p> <p>[3] NELSON PEREIRA a.k.a “ Gemelo” [COUNTS ONE AND TWO]</p> <p>[4] ADALBERTO ORTIZ-DIAZ [COUNTS ONE AND TWO]</p> <p>[5] ORLANDO RIVERA-FUENTES a.k.a “Orlan” [COUNTS ONE AND TWO]</p> <p>[6] JUAN DELGADO-BIAGGI a.k.a “Juaniquillo”, [COUNTS ONE AND TWO]</p> <p>[7] ERNESTO MARTINEZ-GONZALEZ a.k.a “ el Cuñao” [COUNTS ONE AND TWO]</p> <p>[8] ISRAEL MORALES-LAUREANO a.k.a “el Bro”, a.k.a “Mo” [COUNTS ONE AND TWO]</p> <p>[9] GERARDO MOREU-RAMIREZ a.k.a “ Sargento” [COUNTS ONE AND TWO]</p> <p>[10] HAROLD CEDEÑO-ORTIZ a.k.a “ el Fuerte” [COUNTS ONE AND TWO]</p> <p>[11] PABLO FIGUEROA-LANDRON [COUNTS ONE AND TWO]</p>	<p>INDICTMENT</p> <p>CRIMINAL NO. 12-_____ ()</p> <p><u>FILED UNDER SEAL</u></p> <p><u>Violations:</u></p> <p>(COUNT ONE) Title 21, <u>United States Code</u>, §§ 841(a)(1) and 846.</p> <p>(COUNT TWO) Title 21, <u>United States Code</u>, §§841(a)(1) and Title 18, <u>U.S.C.</u>, § 2.</p> <p>(NARCOTICS FORFEITURE ALLEGATION) Title 21, <u>United States Code</u>, § 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.</p> <p>(TWO COUNTS)</p>
---	---

United States v. Luis Colon Ojeda
Indictment

[12] ANGEL TORRES-MORENO
a.k.a “ El Viejo” a.k.a “ El Abuelo”
[COUNTS ONE AND TWO]

[13] CARLOS I. ARCE LOPEZ
a.k.a “ El Ferretero”,
[COUNTS ONE AND TWO]

[14] CARLOS R. CAMACHO SANTIAGO
a.k.a “ Gemelo”,
[COUNTS ONE AND TWO]

[15] HECTOR CARTAGENA-VAZQUEZ
a.k.a “ Jaso”,
[COUNTS ONE AND TWO]

[16] RAFAEL RENOVALES-VAZQUEZ
a.k.a “Pelo”,
[COUNTS ONE AND TWO]

[17] RAMON MATIAS-PEREZ
a.k.a “El Peca” a.k.a “El cocinero”
[COUNTS ONE AND TWO]

[18] HELVIS O. ORTIZ-RIVERA
a.k.a “Junito”
[COUNTS ONE AND TWO]

[19] FERNANDO RIVERA-AVILES
a.k.a “ Fernan”
[COUNTS ONE AND TWO]

[20] PEDRO SAN LUCAS
a.k.a “ Peter”
[COUNTS ONE AND TWO]

Defendants.

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

1. At times pertinent to this indictment, there were several individuals in Puerto Rico that needed to ship kilograms of cocaine to the Continental United States.
2. At times pertinent to this indictment, **WILFREDO RODRIGUEZ-ROSADO** a.k.a “**Mogoyo**” a.k.a “**Pitin**” a.k.a “**Mogo**” a.k.a “**La Gorda**” recruited and organized a group of individuals to package, transport and deliver suitcases loaded with kilograms of cocaine to the American Airlines cargo area at the LOUIS Muñoz Marin International Airport (hereinafter referred as LMMIA) in Carolina, Puerto Rico. Furthermore, also **WILFREDO RODRIGUEZ-ROSADO** a.k.a “**Mogoyo**” a.k.a “**Pitin**” a.k.a “**Mogo**” a.k.a “**La Gorda**” recruited and organized a group of American Airlines employees to ensure that those suitcases were smuggled into American Airlines aircrafts destined to different cities in the Eastern Boundary of the United States.

COUNT ONE

(Conspiracy to Possess With Intent to Distribute Cocaine)

Beginning in or about 1999, the exact date being unknown to the Grand Jury, through September 2009, in the District of Puerto Rico, and elsewhere and within the jurisdiction of this Court,

- [1] **LOUIS T. COLON-OJEDA** a.k.a “**La Flaca**” a.k.a “**el Cabro**”,
- [2] **FRANKLIN T. PRATS** a.k.a “**La Tia**”, a.k.a “**Frank**”
- [3] **NELSON PEREIRA** a.k.a “**Gemelo**”
- [4] **ADALBERTO ORTIZ-DIAZ**
- [5] **ORLANDO RIVERA-FUENTES** a.k.a “**Orlan**”
- [6] **JUAN DELGADO-BIAGGI** a.k.a “**Juaniquillo**”,
- [7] **ERNESTO MARTINEZ-GONZALEZ** a.k.a “**el Cuñao**”
- [8] **ISRAEL MORALES-LAUREANO** a.k.a “**el Bro**”, a.k.a “**Mo**”
- [9] **GERARDO MOREU-RAMIREZ** a.k.a “**Sargento**”
- [10] **HAROLD CEDEÑO-ORTIZ** a.k.a “**el Fuerte**”
- [11] **PABLO FIGUEROA-LANDRON**
- [12] **ANGEL TORRES-MORENO** a.k.a “**El Viejo**” a.k.a “**El Abuelo**”
- [13] **CARLOS I. ARCE LOPEZ** a.k.a “**El Ferretero**”,

[14] CARLOS R. CAMACHO SANTIAGO a.k.a “Gemelo”,
[15] HECTOR CARTAGENA-VAZQUEZ a.k.a “Jaso”,
[16] RAFAEL RENOVALES-VAZQUEZ a.k.a “Pelo”,
[17] RAMON MATIAS-PEREZ a.k.a “El Peca” a.k.a “El cocinero”
[18] HELVIS O. ORTIZ-RIVERA a.k.a “Junito”
[19] FERNANDO RIVERA-AVILES a.k.a “Fernan”
[20] PEDRO SAN LUCAS a.k.a “Peter”

the defendants herein, did knowingly and intentionally combine, conspire, and agree together and with each other, and with diverse other persons known and unknown to the Grand Jury, to knowingly and intentionally possess with the intent to distribute in excess of five (5) kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance as prohibited by Title 21, United States Code, §§ 841(a)(1),(b)(1)(A)(ii). All in violation of Title 21, United States Code § 846.

OBJECTS OF THE CONSPIRACY

It was the object of the conspiracy to smuggle into American Airlines commercial aircrafts, suitcases filled with large amounts of cocaine to be transported from Puerto Rico to the East Boundary of the Continental United States with the intent to generate and obtain large monetary profits.

MANNERS AND MEANS OF THE CONSPIRACY

The manners and means by which the co-conspirators would further and accomplish the object of the conspiracy, among others, included the following:

1. It was part of the manners and means of the conspiracy that the co-conspirators would receive multi kilograms quantities of cocaine from drug traffickers that needed to transport said substances from Puerto Rico to different destinations in the Continental United States.
2. It was part of the manners and means of the conspiracy that some of the co-conspirators would purchase traveler's check-in suitcases, in which they would pack approximately thirty (30)

United States v. Luis Colon Ojeda
Indictment

kilograms of cocaine that, were to be smuggled in an American Airlines commercial aircraft destined to the Continental United States.

3. It was further part of the manners and means of the conspiracy that the co-conspirators would use their residences and other locations to prepare and package suitcases with multi-kilogram quantities of cocaine.

4. It was further part of the manners and means of the conspiracy that some of the co-conspirators would provide to others, airline cargo containers, so they could use them to load the suitcases and then place them in the cargo hold of the aircraft.

5. It was further part of the manners and means of the conspiracy that some of the co-conspirators would provide to others, pre-filled airline luggage tags to place them on the suitcases that were to be smuggled into the American Airlines aircrafts.

6. It was further part of the manners and means of the conspiracy that some of the co-conspirators would bring the suitcases with cocaine to a predetermined location for purposes of loading them into an American Airlines cargo container that was already inside the truck that was going to be delivered them to the airport.

7. It was further part of the manners and means of the conspiracy to have American Airlines (AA) employees, who were members of this conspiracy, receive and facilitate the transportation of the suitcases filled with cocaine from the American Airlines cargo area to the aircraft.

8. It was further part of the manners and means of the conspiracy that an employee of American Airlines who was a member of the conspiracy, would be at the destination point in the Continental United States in order to ensure: a) the unloading of the smuggled suitcases, b) their placement on the conveyor belt and c) to notify other members of the conspiracy when the suitcases were removed from the passenger's baggage claim area.

9. It was further part of the manners and means of the conspiracy that members of this conspiracy transported, or caused to be transported, large sums of drug proceeds, in the form of U.S. currency, from the continental United States to Puerto Rico

10. It was further part of the manners and means of the conspiracy that some of the co-conspirators would use intimidation against other co-conspirators in order to maintain control of their drug smuggling activities.

COUNT TWO

(Aiding and Abetting in Possession with the Intent to Distribute Cocaine)

Beginning in or about 1999, the exact date being unknown to the Grand Jury, through September 2009, in the District of Puerto Rico, and elsewhere and within the jurisdiction of this Court,

- [1] LOUIS T. COLON-OJEDA a.k.a “La Flaca” a.k.a “el Cabro”,**
- [2] FRANKLIN T. PRATS a.k.a “ La Tia”, a.k.a “Frank”**
- [3] NELSON PEREIRA a.k.a “ Gemelo”**
- [4] ADALBERTO ORTIZ-DIAZ**
- [5] ORLANDO RIVERA-FUENTES a.k.a “Orlan”**
- [6] JUAN DELGADO-BIAGGI a.k.a “Juaniquillo”,**
- [7] ERNESTO MARTINEZ-GONZALEZ a.k.a “ el Cuñao”**
- [8] ISRAEL MORALES-LAUREANO a.k.a “el Bro”, a.k.a “Mo”**
- [9] GERARDO MOREU-RAMIREZ a.k.a “ Sargento”**
- [10] HAROLD CEDEÑO-ORTIZ a.k.a “ el Fuerte”**
- [11] PABLO FIGUEROA-LANDRON**
- [12] ANGEL TORRES-MORENO a.k.a “El Viejo” a.ka “ El Abuelo”**
- [13] CARLOS I. ARCE LOPEZ a.k.a “ El Ferretero”,**
- [14] CARLOS R. CAMACHO SANTIAGO a.k.a “ Gemelo”,**
- [15] HECTOR CARTAGENA-VAZQUEZ a.k.a “ Jaso”,**
- [16] RAFAEL RENOVALES-VAZQUEZ a.k.a “Pelo”,**
- [17] RAMON MATIAS-PEREZ a.k.a “El Peca” a.k.a “El cocinero”**
- [18] HELVIS O. ORTIZ-RIVERA a.k.a “Junito”**
- [19] FERNANDO RIVERA-AVILES a.k.a “ Fernan”**
- [20] PEDRO SAN LUCAS a.k.a “ Peter”**

the defendants herein, aiding and abetting each other, and diverse other persons known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute five (5) kilograms

United States v. Luis Colon Ojeda
Indictment

or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, all in violation of Title 21, United States Code, §§ 841(a)(1), 841(b)(1)(A)(ii) and Title 18, United States Code, § 2.

[LEFT INTENTIONALLY IN BLANK]

(FORFEITURE ALLEGATION)

1. Upon conviction of one or more of the offenses alleged in Counts One (1), Two (2) and Three (3) of this Indictment, pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(1), each defendant who is convicted of one or more of the offenses set forth in said counts, shall forfeit to the United States the following property:

A sum of money equal to the total amount of money involved in each offense, or conspiracy to commit such offense, for which the defendant is convicted, to wit: **eighteen million dollars (\$18,000,000.00)** in U.S. Currency. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount involved in such offense.

2. Upon conviction of any of the offenses charged in this indictment the defendants shall also forfeit to the United States:

All right, title, and interest in any and all property involved in each offense in violation of Title 21, United States Code, Section 841 and 846, for which the defendants are convicted, and all property traceable to such property, including the following: 1) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 2) all property used in any manner or part to commit or to facilitate the commission of those violations, including but not limited to :

1. ONE COMMERCIAL LOT, known as Hotel Villa Prats, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located in DISTRITO 1 QUEPOS, CANTON 6 AGUIRRE, PROVINCIA DE PUNTARENAS , COSTA RICA.



2. ONE RESIDENCE, located in Barrio Cotto Norte in the Municipality of Manati. More fully described in the Property Registry of Puerto Rico.

RÚSTICA: Predio radicado en el Barrio Coto Norte del término municipal de Manatí con una cabida superficial de 4582.2922 metros cuadrados. En lindes por el NORTE, en tres líneas continuas que suman 74.371 metros con el remanente de la finca principal; por el SUR, en 70.268 metros con el remanente de la finca principal; por el ESTE, en 61.003 metros con camino municipal; y por el OESTE, en 61.028 metros con terrenos de Aurelio Rodríguez y el remanente de la finca principal. Sobre dicho solar enclava una casa dedicada a vivienda.

13766 INSCRITA AL FOLIO 50 DEL TOMO 372 DE MANATÍ, REGISTRO DE LA PROPIEDAD DE MANATÍ, INSCRIPCIÓN 5ª.

3. ONE COMMERCIAL LOT, known as Ferreteria Arce, together with its buildings, appurtenances, improvements, fixtures, attachments and easements located in Barrio Algarrobo in the Municipality of Vega Baja, More fully described in the Property Registry of Puerto Rico.

RÚSTICA: Parcela marcada con el Numero Doscientos sesenta y tres (263) en el plano de parcelación de la comunidad Coto Norte del Barrio Algarrobo del término municipal de Vega Baja, Puerto Rico, con una cabida superficial de 0.2580 cuerdas equivalentes a 1013.84 metros cuadrados y en lindes por el NORTE, con la parcela número 232 de la comunidad; por el SUR, con Carretera Estatal Número 660; por el ESTE, con la parcela número 264 de la comunidad y por el OESTE, con la parcela número 262 de la comunidad.

6054 INSCRITA AL FOLIO 176 DEL TOMO 126 DE VEGA BAJA, SECCIÓN IV, REGISTRO DE LA PROPIEDAD DE BAYAMÓN, INSCRIPCIÓN 4ª.

4. ONE URBAN LOT, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Yeguada, Vega Baja, Puerto Rico, more particularly described as:

United States v. Luis Colon Ojeda
Indictment

RUSTICA: Predio de terreno radicado en el Barrio Yeguada del término municipal de Vega Baja, Puerto Rico, que compone en el solar marcado con el No. 7 del Proyecto Palma Real en el plano de inscripción, con una cabida superficial de 1,000.00 metros cuadrados. En lindes por el NORTE, con el solar No. 5, en una extensión de 45.537 metros; por el SUR, con el solar No. 9, en una extensión de 44.424 metros; por el ESTE, con Pedro D. León, en una extensión de 22.231 metros; y por el OESTE, con calle que da acceso al proyecto, en una extensión de 22.264 metros. Discurre a lo largo de la colindancia Oeste de éste solar una servidumbre de 5' de ancho para el servicio de teléfono y cable televisión (Cable T.V.)

Property No. 30823, recorded at page 81 of volume 426 of Vega Baja.
Registry of Property, Fourth Section of Bayamón.

b. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), each defendant shall forfeit substitute property, up to the value of the amount described in section one (1), if, by any act or omission of the defendant, the property described in section one (1), or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold to or deposited with a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty. The substitute property shall include but not be limited to the following:

1. ONE URBAN LOT, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Cotto Sur, Manatí, Puerto Rico, more particularly described as:

RÚSTICA: Predio de terreno radicado en el Barrio Coto Sur, del término municipal de Manatí, Puerto Rico, con una cabida superficial de 12922.2901 metros cuadrados, equivalentes a 3.2880 cuerdas. En lindes por el NORTE, con el remanente de la finca principal de La Autoridad de Tierras y con predio a dedicarse a uso público; por el SUR, con el remanente de la finca propiedad de La Autoridad de Tierras; por el ESTE, con el remanente de la finca propiedad de La Autoridad de Tierras; y por el OESTE, con remanente de la finca propiedad de La Autoridad de Tierras. 13485 INSCRITA AL FOLIO 120 DEL TOMO 361 DE MANATÍ, REGISTRO DE LA PROPIEDAD DE MANATÍ, INSCRIPCIÓN 7ª.

2. ONE URBAN LOT, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Cotto Norte, Manatí, Puerto Rico, more particularly described as:

United States v. Luis Colon Ojeda
Indictment

RÚSTICA: Parcela marcada con el número 262 en el plano de parcelación de la Comunidad Rural Coto Norte del Barrio Coto Norte del término municipal de Manatí con una cabida superficial de 0.2579 cuerdas, equivalentes a 1013.80 metros cuadrados. En lindes por el NORTE, con parcela número 233 de la comunidad; por el SUR, con Carretera PR-670; por el ESTE, con parcela número 263 de la comunidad; y por el OESTE, con parcela número 261 de la comunidad. 9111 INSCRITA AL FOLIO 50 DEL TOMO 207 DE MANATÍ, REGISTRO DE LA PROPIEDAD DE MANATÍ, INSCRIPCIÓN 3ª.

All in accordance with Title 18, United States Code, §§ 853 and 982(a)(1) and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

TRUE BILL

FOREPERSON

Date: _____

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

José Ruiz-Santiago
Assistant United States Attorney
Chief, Criminal Division

Timothy R. Henwood
Assistant United States Attorney
Chief, Narcotics Unit

Olga B. Castellón-Miranda
Assistant United States Attorney

Maritza Gonzalez-Rivera
Assistant United States Attorney

Mariana Bauza-Almonte
Assistant United States Attorney